

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

48  
4-24-02  
FILED SC  
HARRISBURG

APR 23 2002

BRETT T. CULVER

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA,  
et al.,

Defendants.

MARY E. D'ANDREA, CLERK  
MOTION DEPUTY CLERK

Case No. 1:01-cv-00904

(Judge Kane)

MOTION TO ORDER DEFENDANT'S TO COMPLY WITH INTERROGATORIES REQUESTS

On March 1, 2002 this plaintiff submitted his first set of Interrogatories to the defendants in Case No. 1:01-cv-00904 to sequester evidence documents, statements, testimonies, and Procedural dictates.

Consistent with the defendants non-compliance of rules, regulations, and responsibilities required by D.O.C. Procedure/Directives/Policy and the Constitutional Laws of the U.S., the defendants (namely R. Shannon, V. Mooney, K. Kane, T. Miknich), along with counsel M. Lewis, continue to refuse cooperation/compliance with legal requirements in such proceedings, and continue to commit perjury with false statements in response to questioning on violations committed and/or conspired/collaborated personal involvements. The defendant's refuse to cooperate and submit to proceedings and legalities in this Action, and continue to submit false testimonial responses to the plaintiff's first set of Interrogatories, as record documentation and D.O.C. Policy Directives and Procedure will testify, as will intentional and deliberate legal violations of actions, statements, testimonies, and conduct of non-compliance and deception by the defendant's will be evident through Court proceedings.

The documents turned over in the Defendant's Responses to Interrogatories is not the information, record, or testimony inquired of or sequestered in the plaintiff's interrogatories dated 03-01-02.

In the first set of Interrogatories submitted by this plaintiff (03-01-02), the information and testimony requested is directly "relative and resultive" of the incidents and violations committed against this plaintiff, which charges are of Complaint (Case No. 1:01-cv-00904), which does in fact include the actions, statements, and testimonies of the defendant's in this Action. The information requested in the Interrogatories has been "the record evidence and testimony" of incidents, and that surrounding (relative/causative of) the incidents of violations committed by the defendant's. Said sequestered/requested information is the existing record and evidence of the violations committed by the defendant's which is presently (and continues to be) with-held and obscured by the defendant's in this Case.

The defendant's (Case No. 1:01-cv-00904) continue to rely on ties within the System to shield them from responsibility and accountability for their intentional and deliberate actions of violations against this plaintiff who is subjugated to their authority, including the defendant's intentional and deliberate acts of corruption in misuse/abuse of authority and positions entrusted to them by the Department of Corrections. The defendant's continue to rely on Administrative, Official, and Governmental ties within the System to shield and protect said defendant's from the actions of violations and abuse, including the protection and advantage of free legal representation/professional services at the expense of Tax Payers dollars, which fair equivalent of legal services and representation is denied this layman plaintiff (victim), which constitutes further abuses being perpetrated through the injustices permitted by the defendant's. Being that the information/testimonies requested in the plaintiff's first set of Interrogatories is sensitive and damning to the defendants, said defendant's continue to refuse cooperation and compliance with the requirements and legalities of procedures/proceedings in this Action, and continue to commit perjury by untruthful statements and testimony responses which have been documented. The defendant's continue to with-hold evidentiary information/documentation, and continue to respond un-truthfully in response.

WHEREFORE,, this plaintiff MOTIONS this Court to ORDER the defendants to comply fully with the dictates of legal procedures and Court proceedings, and to submit and/or comply with the Interrogatories in this Action. Plaintiff also MOTIONS that this Court enter the Responses To Plaintiff's Interrogatories made by the defendant's and counsel (dated 04-03-02) and enter said responses as evidence in Case No. 1:01-00904.

UNSWORN DECLARATION AFFIDAVIT

I Brett T. Culver do hereby verify that the facts set forth in the foregoing MOTION to the Court dated 04-17-02 are true and correct to the best of my personal knowledge, or information and belief, and that any false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.

Truthfully Submitted,

*Brett T. Culver*

Brett T. Culver,

Plaintiff.

Verified this 17 day of April, 2002.

PROOF OF SERVICE

*Motion to Order Defendant's to Comply with Interrogatories Requests*

I, the undersigned, hereby aver that I have served the foregoing MOTION dated 04-17-02 upon the U.S. District Court in the manner indicated:

SERVED BY U.S. MAIL ADDRESSED AS FOLLOWS:

- (1) copy: U.S. DISTRICT COURT, CLERK OF COURTS, 228 Walnut St., P.O. Box 963, Harrisburg, Pa. 17108
- (1) copy each: Defendant's R. Shannon, T. Miknich, K. Kane, , V. Mooney  at S.C.I. Mahanoy, 301 Morea Rd., Frackville, Pa. 17932 (Served through Institutional Mail System).
- (1) copy: Defendant's M. Horn, J. Beard in care of Defendant's Counsel M. Lewis. 15th Floor Strawberry Sq., Harrisburg, Pa. 17120

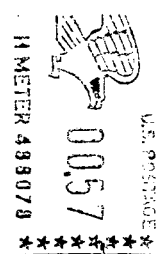
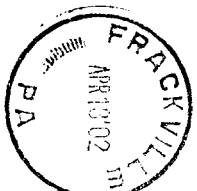
Served this 17 day of April, 2002

Signature, *Brett T. Culver*

NAME Brett Culver  
NUMBER DD3483  
301 MOREA ROAD  
FRACKVILLE, PA 17932

FILED  
HARRISBURG  
APR 23 2002  
MARY E. D'ANDREA, CLERK  
Per DEPUTY CLERK

U.S. District  
Clerk of Courts  
228 Walnut St.  
P.O. Box 983  
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